

# Exhibit “A”



of Defendants as outlined in the First Amended Complaint. There exists good cause to use a pseudonym due to the harmful effect of the public disclosure of my identity and the harm inflicted by the Defendants to me.

4. My attorneys, with my authority, have provided my identity to the attorneys representing Moving Defendants.
5. As alleged in the First Amended Complaint, I am a survivor of sexual abuse. I was sexually abused by Lorin Ashton at a time when I was a minor and under the age of eighteen (18). In addition to the acts of sexual abuse I suffered at the hands of Ashton, he also caused me to send to him sexually explicit photographs while I was a minor and under the age of eighteen (18). These images still exist and I understand they may be subject to discovery in this matter.
6. I am also a survivor of significant physical, emotional and sexual domestic abuse that Defendant Ashton knows about.
7. I wish to maintain my privacy. Through the course of this lawsuit it will be necessary for me to disclose details of my personal life that involve facts that are of the utmost intimacy. Furthermore, it will be necessary for me to disclose intimate facts and details of parts of my life when I was not consenting and/or did not have the ability to truly consent in relation to the acts being committed against me.
8. If my identity is disclosed, I fear that I will be re-traumatized as a survivor of child sexual abuse and trafficking, that I will be subject to public ridicule and scorn, that I will be subject to other emotional and reputational harms from the association of my name online with the sexual abuse I suffered, that my safety may be compromised through actions of my assailant including those that support him harassing and/or stalking me either or both in

person and/or online. I understand that Ashton in particular in his motion has suggested he broadcast my private information and identity in order to find “unknown witnesses” who will come forward against me. This alone has caused tremendous anxiety and only further reinforced my fears of what he and/or his companies may do with my identity should it be disclosed publicly. I am aware of other individuals who received threatening and harassing phone calls following the filing of the original Complaint against Ashton by Ms. Ramsbottom and Ms. Bowling.

9. I have never identified myself publicly, through the media or otherwise, in relation to this litigation nor have I spoken to or cooperated with any member of the media concerning the details of my abuse.
10. I have been and continue to undergo therapy and treatment relating to the injuries and damages I suffered at the hands of Ashton. Forcing me to disclose my identity publicly will result in a significant exacerbation of what I have already suffered and continue to suffer from as a result of what occurred.

I declare under the penalty of perjury that the foregoing is true and correct. I signed this declaration under the penalty of perjury on the date below but have instructed my attorneys to redact my name for the purposes of filing this declaration as part of the public court record.

Executed this 18th day of May, 2021 in the State of Illinois.

A black rectangular redaction box covering the signature of Jane Doe #1.

Jane Doe #1

Vinesign

This document was signed by:

[REDACTED]

[REDACTED]

Date 5/18/2021 3:36 PM UTC

Phone

[REDACTED]

IP Address

[REDACTED]

Confirmation

[REDACTED]



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